

Our Docket No.: 42P11564C2

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:)	
)	
Narayan P. Menon)	Examiner: Backer, Firmin
)	
Application No.: 10/803,374)	Art Group: 3621
)	
Filed: March 18, 2004)	
)	
For: Wireless Access Unit with Trunk Interface)	

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REPLY BRIEF
IN SUPPORT OF APPELLANT'S APPEAL
TO THE BOARD OF PATENT APPEALS AND INTERFERENCES

Sir:

In response to the Examiner's Answer mailed December 11, 2009, Appellant hereby submits this Reply Brief (hereinafter "Reply") in support of its appeal from a final decision by the Examiner, August 25, 2006, in the above-referenced Application.

**I. THERE IS NO ANTICIPATION WITHOUT A SHOWING OF THE
CLAIMED “WIRELESS ACCESS COMMUNICATIONS UNIT”**

The Examiner's Answer does not address all of the issues raised in Appellant's Brief. The outstanding rejection is for anticipation. Appellant has pointed out that the following claim elements are absent from the reference (Sicher et al., US-A1-2001/0015968) and the Examiner has not answered this point. Accordingly, the rejection for anticipation cannot be sustained by the reference.

“a wireless access communications unit to route calls from user stations coupled to the central telephone switch to the wireless cellular communications network in response to a command received from the central telephone switch.”

**II. THERE IS NO ANTICIPATION WITHOUT A SHOWING OF THE
OTHER CLAIM ELEMENTS THAT PROVIDE THE CONTEXT OF THE
WIRELESS ACCESS COMMUNICATIONS UNIT**

The Examiner has answered Appellant regarding some of the other claimed elements. However, the argument is little more than a repetition of the vague assertions in the final rejection. As pointed out earlier, Sicher applies to a different context and does not show the elements specifically recited in the claims.

A. Trunk Interface

The Examiner points to the E-IWF (enhanced Interworking Function) shown in Figures 2 and 3. As can be seen in those figures, the E-IWF interfaces an IS-136 cellular telephone system to the Internet 13 and supports VoIP, UDP, TCP/IP and similar Internet protocols. Claim 1 for example, goes much farther than this.

It recites, “a trunk interface unit having a plurality of subscriber ports, each port being coupled to a trunk of a central telephone switch.”

So Sicher just does not have a trunk, subscriber ports, nor a central telephone switch connection. None of these are necessary for the Internet functionality described. Paragraph 28, lines 7 et seq. express the feature that the W-IWF connects “without going through the PSTN.” Not only does Sicher not show any interface to a trunk of a central telephone switch, such an interface is intentionally avoided.

B. SLIC (Subscriber Line Interface Card)

The Examiner points to a mention in Table 1 of the specification of network interface cards. There is no other mention of these NICs anywhere else in the specification. Taking the statements at face value, a SLIC is a specific piece of telephone equipment that provides PSTN type telephone signaling: line voltage; dial tone, ringing; DTMF signaling; etc. A NIC is used in computers and routers typically for an Ethernet interface. Table 1 lists several networking protocols for the Data Link: NIC. While an Ethernet cable and a telephone cord look similar, the protocols and the devices that they can communicate with are very different..

Claim 1 recites, “a plurality of subscriber line interface cards, each coupled to a subscriber port to provide loop interface functions to the central telephone switch.”

Sicher does not have the ports to the central telephone switch, nor loop interface functions (loop is conventional telephony terminology for a loop of twisted pair wiring and function such as line voltage; dial tone, ringing; DTMF signaling; etc), nor a SLIC to provide these things.

C. Further specific connections

The Examiner's Answer points to vague statements in Sicher that certain functions are performed. These functions are similar to some of the functions recited in Claim 1, but the rest of the claim limitations are not to be found in the reference. Portions of Claim 1 are reproduced below with some of the more specific connections highlighted.

“a subscriber interface module **associated with each subscriber line interface card.**”

“a radio transceiver **to communicate** with a wireless cellular communications network **using a wireless trunk**”

“a control section **coupled to each subscriber line interface card, to each of the subscriber interface modules, and to the radio transceiver** to receive voice and signaling from each of the subscriber line interface cards to package and format the received voice and signaling for the wireless communications network and, **using the subscriber interface modules**, to coordinate and control over the air protocols of the wireless communications network.”

Applicants respectfully submit that the vague statements of different functions are simply insufficient to invalidate the specific limitations recited in the claims.

D. In Brief

In brief, the present invention has a “wireless access communications unit” that interfaces between landlines and cell phones. On the landline side SLICs, such as those in the PSTN make the connection. On the cellular side a radio transceiver makes the connection. This is simply a different approach than that of Sicher and Claim 1, for example, reflects this.


III. CONCLUSION

Appellant respectfully submits that all appealed claims in this application are patentable and were improperly rejected by the Examiner during prosecution before the United States Patent and Trademark Office. Appellant respectfully requests that the Board of Patent Appeals and Interferences overrule the Examiner and direct allowance of the rejected claims.

Please charge any shortages and credit any overpayments to our Deposit Account No. 02-2666.

Respectfully submitted,
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Dated: February 5, 2009



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